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ATTORNEYS FOR LESLIE PRITCHARD,
GALMOR FAMILY LIMITED PARTNERSHIP,
AND GALMOR MANAGEMENT, LLC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

IN RE:	§	
	§	
MICHAEL STEPHEN GALMOR,	§	CASE NO. 18-20209-RLJ-7
	§	
Debtor.	§	
	§	
And	§	
	§	
GALMOR'S/G&G STEAM SERVICE,	§	CASE NO. 18-20210-RLJ-7
INC.,	§	
	§	
Debtor.	§	
<hr/>		
	§	
KENT RIES, TRUSTEE,	§	
	§	
Plaintiff,	§	
	§	
v.	§	ADVERSARY NO. 20-2003
	§	
GALMOR FAMILY LIMITED	§	
PARTNERSHIP and GALMOR	§	
MANAGEMENT, L.L.C.,	§	
	§	
Defendants.	§	

DEFENDANTS' AMENDED TRIAL WITNESS AND EXHIBIT LIST

COME NOW Galmor Family Limited Partnership ("GFLP") and Galmor Management, LLC ("GM LLC"), by and through their court-appointed liquidator Leslie Pritchard ("Pritchard"),

with GFLP and GM LLC, the “Defendants”), and file this their *Trial Witness and Exhibit List* (the “Designation”), for purposes of the trial scheduled in this Adversary Proceeding, as follows:

I. WITNESSES

The Defendants reserve the right to call any or all of the following witnesses:

1. Michael Steven Galmor;
2. Leslie Prichard;
3. Maison Vasek;
4. Traci Coleman;
5. Matt Brooks;
6. Derek Reddell;
7. rebuttal and impeachment witnesses as appropriate.

II. EXHIBITS

The Defendants reserve the right to offer any or all of the following into evidence:

- A. GFLP QuickBooks Transaction Detail – April 2013 through October 2018;
- B. GFLP Quickbooks General Ledger All Transactions (excel file);
- C. GFLP First National Bank Statements;
- D. GFLP 1st National Bank of Commerce / AimBank Bank Statements;
- E. Trust Distribution Deed;
- F. John Deere Financial Correspondence;
- G. John Deere Financing Statements;
- H. John Deere GFLP Internal Analysis;
- I. John Deere Account Summary Notices and Statements;
- J. John Deere Account Transaction History;
- K. Ad Valorem – Internal GFLP Analysis;

- L. Ad Valorem – General Warranty Gift Deed;
- M. GFLP 2017 Partnership Tax Return;
- N. Docket 14 - Galmor's/G&G Steam Service, Inc. Statement of Financial Affairs;
- O. Schedule of Alleged FLP Advances;
- P. Docket 15 – Galmor's/G&G Steam Service, Inc. Statement of Financial Affairs;
- Q. Docket 94 – Declaration Concerning Amended Schedules and Amended Schedules;
- R. Docket 21 – MSG Statement of Financial Affairs;
- S. GFLP 2016 Partnership Tax Return;
- T. MSG 2017 Individual Tax Return;
- U. Galmor's/G&G Steam Service, Inc. Profit & Loss December 2014–December 2018;
- V. Galmor's/G&G Steam Service, Inc. Profit & Loss December 2013–December 2017;
- W. GFLP Profit & Loss December 2013–December 2018;
- X. SGM Leasing LLC 2017 S-Corporation Return;
- Y. SGM Leasing LLC 2016 S-Corporation Return;
- Z. Galmor Management LLC 2016 Partnership Return;
- AA. Galmor's/G&G Steam Service, Inc. Customer QuickReport July 1, 2013 through December 10, 2018;
- BB. Galmor's Accounting;
- CC. Deed of Trust;
- DD. Unanimous Written Consent of Managers of Galmor Management LLC July 2014;
- EE. Removed;
- FF. Amendment and Ratification of Compromise and Settlement Agreement;
- GG. Agreement of Limited Partnership of Galmor Family Limited Partnership;
- HH. Company Agreement of Galmor Management, LLC;

- II. The Bobby Don and Shirley Jo Galmor Living Trust dated July 20, 2005 and amendments to same;
 - JJ. General Warranty Deed May 24, 2013 (Jacey Kaylan Carter);
 - KK. Ritchies Brothers Auction/Kubota;
 - LL. Homestead Addition Schiapucci Check Stubs;
 - MM. Western Equipment/John Deere Invoices;
 - NN. Galmor Management LLC Corporate Minutes;
 - OO. Homestead Improvement Invoices;
 - PP. Expert Report of Maison Vasek
 - QQ. Expert Report of Maison Vasek – Exhibit A
 - RR. GFLP QuickBooks File;
 - SS. Wheeler General Store / Galmor Land & Cattle Invoices;
 - TT. Galmor’s G&G Audit Trail (excel file);
 - UU. Galmor’s G&G – 5006 Royalty Expense (GFLP) QuickBooks;
 - VV. Galmor’s G&G – Royalty Pricing Analysis;
 - WW. Expert Document – Royalty Pricing Analysis
 - XX. Galmor’s G&G Audit Trail (Exhibit TT printed to PDF);
 - YY. GFLP QuickBooks General Ledger All Transactions (Exhibit B “general ledger” tab printed to PDF);
 - ZZ. GFLP QuickBooks Balance (Exhibit B “balance” tab printed to PDF);
 - AAA. GFLP QuickBooks Income (Exhibit B “Income” tab printed to PDF);
 - BBB. GFLP QuickBooks P&L By Year (Exhibit B “pl by year” tab printed to PDF);
 - CCC. GFLP QuickBooks BS By Year (Exhibit B “bs by year” tab printed to PDF);
 - DDD. Galmor’s G&G Electronic QuickBooks file;
 - EEE. Rebuttal and impeachment exhibits as appropriate.
- RESPECTFULLY SUBMITTED this 10th day of March, 2022.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Thomas Berghman

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MANAGEMENT, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 10th day of March, 2022, a true and correct copy of this document was electronically served by the Court's ECF system on Kent Ries, counsel for plaintiff, and that, on the same day, a true and correct copy of the added exhibits was served on Mr. Ries via e-mail.

By: /s/ Thomas Berghman
Thomas D. Berghman, Esq.